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January 19, 2021

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Via ECF

Honorable Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 619  
New York, NY 10007

Re: *Wamai et al v. Industrial Bank of Korea*, 1:21-cv-00325-ER

Dear Judge Ramos:

As counsel for Defendant Industrial Bank of Korea ("IBK"), we respectfully submit this statement pursuant to Local Civil Rule 1.6 of the United States District Court for the Southern District of New York, in compliance with counsel's duty "to bring promptly to the attention of the Court all facts which said attorney believes are relevant to a determination that said case and one or more pending civil or criminal cases should be heard by the same Judge, in order to avoid unnecessary duplication of judicial effort."

This action is brought against IBK by judgment creditors of the Islamic Republic of Iran in the following actions: *Amduso v. Republic of Sudan*, No. 08-01361 (D.D.C.) ("*Amduso* Suit"); *Wamai v. Republic of Sudan*, No. 08-01349 (D.D.C.) ("*Wamai* Suit"); *Onsongo v. Sudan*, No. 08-1380 (D.D.C.) ("*Onsongo* Suit"). In this action, the plaintiffs bring claims against IBK for (1) Rescission and Turnover of Fraudulent Conveyances in Violation of New York Debtor and Creditor Law § 273-a; (2) Rescission and Turnover of Fraudulent Conveyances in Violation of New York Debtor and Creditor Law Section 276; (3) Turnover Pursuant to C.P.L.R. § 5225; and (4) Turnover Pursuant to the Terrorism Risk Insurance Act.

All or virtually all of these same plaintiffs have filed an action currently pending in this Court before the Honorable Denise L. Cote asserting the same four causes of action against Turkiye Halk Bankasi A.S. ("Halkbank") seeking to satisfy fully those same underlying judgments against the Islamic Republic of Iran. *See Owens v. Turkiye Halk Bankasi A.S.*, 1:20-cv-02648-DLC (S.D.N.Y.).

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The civil cover sheet filed by the Plaintiffs in this action did not designate this action as related to the Halkbank action.

In submitting this statement in compliance with counsel's obligations under the Local Rules of this Court, counsel expressly reserves and does not waive any and all defenses of IBK, including but not limited to those under the Foreign Sovereign Immunities Act.

Sincerely,

/s/ Carl H. Loewenson Jr.  
Carl H. Loewenson Jr.

cc: The Honorable Denise L. Cote (via UPS Overnight Delivery)  
All Counsel of Record (via ECF)